

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ALTON CAUDELL, individually and on behalf of all persons similarly situated, Plaintiff,
v.
RDL ENERGY SERVICES, LP, Defendant.

Civil Action No.: 2:11-cv-01523-JFC
ELECTRONICALLY FILED
Judge Joy Flowers Conti

**PLAINTIFF'S UNOPPOSED MOTION FOR
APPROVAL OF THE SETTLEMENT AGREEMENT**

This Fair Labor Standards Act (“FLSA”) collective action lawsuit has been settled by and between Plaintiff Alton Caudell (“Plaintiff”), individually and on behalf of all persons similarly situated, and Defendant RDL Energy Services, LP (“RDL” or “Defendant”). Plaintiff respectfully moves this Court for an Order approving the Joint Stipulation and Settlement Agreement (“Settlement Agreement”), which is attached hereto as Exhibit 1. Defendant does not oppose this Motion.

Plaintiff respectfully submits that this Motion should be granted because the proposed Settlement Agreement represents a fair and reasonable resolution of a *bona fide* dispute. Accordingly, Plaintiff seeks an order: 1) approving the Settlement Agreement; 2) certifying the FLSA collective action as a class for purposes of settlement only on behalf of “individuals currently or formerly employed by RDL who were assigned to work as air operators or similar positions and who were paid on a day-rate basis for at least one workweek in which they worked four days or more between March 14, 2009 and May 8, 2012”; and 3) approving the “Notice of Fair Labor Standards Act Settlement” and “Settlement Claim Certification and Consent to Join

Settlement Form," attached as Exhibits A and B to the Settlement Agreement, to be sent to Potential Opt-In Plaintiffs so they can receive notice of and participate in the settlement.

In support of this Motion, Plaintiff relies on the accompanying memorandum of law; the Settlement Agreement and exhibits attached thereto; the Declaration of Shanon J. Carson; the Declaration of David A. Hughes, and all other pleadings and materials properly on file with this Court.

June 29, 2012

Respectfully submitted,

s/ Shanon J. Carson
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon counsel for Defendants through the Court's ECF system this 29th day of June, 2012, addressed as follows:

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